

Michael J. Canning, Esq. (MJC3060)  
**GIORDANO, HALLERAN & CIESLA, P.C.**  
125 Half Mile Road, Suite 300  
Red Bank, N.J. 07701-6777  
(732) 741-3900  
Attorneys for Defendant, Cohen, Weiss and Simon LLP

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

DANIEL D'AMBLY,

Plaintiff,

v.

CHRISTIAN EXOO a/k/a ANTIFASH  
GORDON; ST. LAWRENCE  
UNIVERSITY; TRIBUNE PUBLISHING  
COMPANY; NEW YORK DAILY NEWS;  
VIJAY GADDE; TWITTER, INC.;  
COHEN, WEISS AND SIMON LLP,

Defendants.

Case No. 2:20-cv-12880-JMV-JAD

Civil Action

**COHEN, WEISS AND SIMON LLP'S  
NOTICE OF MOTION FOR SANCTIONS  
PURSUANT TO FED.R.CIV.P. 11(c)**

**MOTION DATE: January 3, 2022**

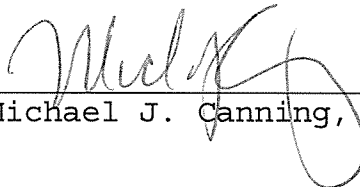
**PLEASE TAKE NOTICE** that Giordano, Halleran & Ciesla, P.C., counsel for Defendant, Cohen, Weiss and Simon LLP ("CWS"), shall move before the United States District Court for the District of New Jersey, located at 50 Walnut Street, Newark, New Jersey on \_\_\_\_\_, 20\_\_\_\_ at 9:00 a.m. or as soon thereafter as counsel may be heard, for the entry of an order imposing sanctions against Plaintiff, Daniel D'Ambly and awarding CWS reasonable attorneys' fees and costs against Plaintiff's counsel pursuant to Fed.R.Civ.P. 11(c).

PLEASE TAKE FURTHER NOTICE that in support of the motion, CWS shall rely upon the Certification of Michael J. Canning, Esq. and Memorandum of Law.

PLEASE TAKE FURTHER NOTICE that oral argument is requested if opposition to this motion is filed.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

GIORDANO, HALLERAN & CIESLA, P.C.  
Attorneys for Defendant, Cohen,  
Weiss and Simon LLP

By:   
Michael J. Canning, Esq.

Dated: December 3, 2021